

EXHIBIT L

From: Aaron Cera <aCera@saverilawfirm.com>
Sent: Friday, August 30, 2024 1:08 AM
To: Ghajar, Bobby A.; Lauter, Judd; Hartnett, Kathleen; adunning@cgsh.com; Ghazarian, Colette A; Stameshkin, Liz; Biksa, Liene; Alvarez, Jessica; mlemley@lex-lumina.com
Cc: Joseph Saveri; Cadio Zirpoli; Christopher Young; Holden Benon; Ruby Ponce; Margaux Poueymirou; Elissa A. Buchanan; Ashleigh Jensen; Heaven Haile; Rya Fishman; Matthew Butterick; Bryan L. Clobes; Alexander Sweatman; Mohammed Rathur; dmuller@venturahersey.com; Nada Djordjevic; David Straite; akeller@dicellolevitt.com; julwick@dicellolevitt.com
Subject: Re: Kadrey et al. v. Meta: Letter re Depositions and Additional Custodians

[External]

Counsel,

We write to follow up on certain items discussed during today's call.

Defendant Depos

Pursuant to N.D. Cal. Civil L.R. 30-1 we would like to schedule a time next week to meet and confer on agreeable dates and locations for the deponents below. Further, we would like to confer on agreeable dates and locations for Ms. Kambadur and Mr. Mihaylov. Below, please find a list of individuals we intend to notice for deposition. Plaintiffs reserve all rights with respect to seeking additional depositions.

Ahmad Al-Dahle
Amrish Acharya
Angela Fan
Aurelien Rodriguez
Arun Rao
Chaya Nayak
Edouard Grave
Eleonora Presani
Eugene Nho
Guillaume Lample
Hugo Touvron
Joelle Pineau
Josh Ginsberg
Lukas Blecher
Luke Zettlemoyer
Mark Zuckerberg
Meta's 30(b)(6) Witnesses
Moya Chen
Nikolay Bashlykov
Nisha Deolaliker
Sergey Edunov
Susan Zhang

Tim Dettmers
Xavier Martinet
Yann LeCun

Plaintiff Depos

We also write to provide an update on the dates and locations for Plaintiffs Silverman, Golden, and Kadrey. We believe we should have a mutual exchange of proposed dates and times for both parties' deponents. To that end, we are available next week to meet and confer on dates and times for the noticed depositions. Please provide your availability. Counsel for Plaintiffs Coates, Diaz, Greer, Hwang, Klam, Lippman, Snyder and Woodson will send a separate email addressing deposition notices and following-up on today's meet and confer discussion regarding related issues. Similarly, counsel for Plaintiff TerKeurst has been communicating with you separately, will provide topics for discussion soon, and is waiting for your response on dates to meet and confer, regarding Ms. TerKeurst's deposition.

Best,
Aaron

Aaron Cera
Associate

JOSEPH SAVERI
LAW FIRM

601 California Street, Suite 1505
San Francisco, CA 94108
T 415.500.6800 x909
F 415.395.9940

From: Lauter, Judd <jlauter@cooley.com>

Sent: Monday, August 26, 2024 11:19 PM

To: Hartnett, Kathleen <khartnett@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com <adunning@cgsh.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; julwick@dicellolevitt.com <julwick@dicellolevitt.com>; akeller@dicellolevitt.com <akeller@dicellolevitt.com>

Cc: Ruby Ponce <rponce@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Elissa A. Buchanan <EABuchanan@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Heaven Haile <hhaile@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Mohammed Rathur <mrathur@caffertyclobes.com>; dmuller@venturahersey.com <dmuller@venturahersey.com>

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External (jlauter@cooley.com)

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Holden,

Per your email on Sunday, we should schedule our other meet confer during this window as well. We can address your letter from Thursday at 11, followed by the Friday letter.

Best,
Judd

Judd Lauter

Cooley LLP
+1 415 693 2915 office
jlauter@cooley.com

From: Hartnett, Kathleen <khartnett@cooley.com>

Sent: Monday, August 26, 2024 10:57 PM

To: Holden Benon <hbenon@saverilawfirm.com>; Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com; Ghazarian, Colette A <cghazarian@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com; julwick@dicellolevitt.com; akeller@dicellolevitt.com

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Holden,

We can do that window on Thursday. We have two team members in an all-day mediation tomorrow and needed to consult with our client today before responding to you.

Thanks,
Kathleen

From: Holden Benon <hbenon@saverilawfirm.com>

Sent: Monday, August 26, 2024 10:32 PM

To: Hartnett, Kathleen <khartnett@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com; Ghazarian, Colette A <cghazarian@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com; julwick@dicellolevitt.com; akeller@dicellolevitt.com

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Kathleen,

We disagree with your characterization of Plaintiffs' proposals.

We have team members out of office on Wednesday. Is Meta available tomorrow as we requested? We are also available on Thursday between 11am-1pm.

Please let us know.

Thanks,
Holden

From: Hartnett, Kathleen <khartnett@cooley.com>

Sent: Monday, August 26, 2024 9:57 PM

To: Holden Benon <hbenon@saverilawfirm.com>; Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com; Ghazarian, Colette A <cghazarian@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com; julwick@dicellolevitt.com; akeller@dicellolevitt.com

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Counsel,

We are reviewing with our client the letter you sent late Friday afternoon proposing radical changes to the discovery process in this case, under which the parties have been operating for months. Please let us know your availability to confer on Wednesday of this week.

Thanks,
Kathleen

Kathleen R. Hartnett

Cooley LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
+1 415 693 2071 office
+1 415 693 2222 fax
+1 202 368 5916 mobile
khartnett@cooley.com
www.cooley.com/people/kathleen-hartnett
Pronouns: she, her, hers

From: Holden Benon <hbenon@saverilawfirm.com>

Sent: Friday, August 23, 2024 4:43 PM

To: Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com; Ghazarian, Colette A <cghazarian@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Hartnett, Kathleen

<khartnett@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>;
mlemley@lex-lumina.com; julwick@dicellolevitt.com; akeller@dicellolevitt.com

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Bobby:

Please see the enclosed letter.

Best,
Holden

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